



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION IX

75 Hawthorne Street  
San Francisco, CA 94105-3901

AUG 30 2018

Mr. Timothy S. Franquist  
Director, Air Quality Division  
Arizona Department of Environmental Quality  
1110 West Washington Street  
Phoenix, Arizona 85507

Dear Mr. Franquist:

Thank you for Arizona Department of Environmental Quality's (ADEQ's) exceptional events demonstrations submittal dated December 21, 2017. This letter responds to ADEQ's request that the U.S. Environmental Protection Agency (EPA) exclude PM<sub>10</sub> data influenced by high wind dust on April 25, May 17, July 29<sup>1</sup>, and September 27-28, 2016. In the demonstrations, ADEQ states that high wind dust caused exceedances of the 1987 PM<sub>10</sub> National Ambient Air Quality Standards (NAAQS) at the following monitoring locations: West 43<sup>rd</sup> Avenue (AQS ID: 04-013-4009), Dysart (AQS ID: 04-013-4010), Zuni Hills (AQS ID: 04-013-4016), Glendale (AQS ID: 04-013-2001), and JLG Supersite (AQS ID: 04-013-9997). EPA acknowledges that ADEQ submitted these demonstrations in accordance with 40 CFR 50.14(c).

Section 319(b) of the Clean Air Act (CAA) authorizes EPA to consider air agency requests to exclude air quality monitoring data that is directly due to exceptional events from use in determinations by the Administrator with respect to exceedances or violations of the NAAQS. EPA's implementing regulations also explain that the Exceptional Event Rule's applicability is limited to NAAQS exceedances or violations that could influence specific regulatory determinations by EPA (*i.e.*, situations that have regulatory significance). *See* 40 CFR 50.14(a)(1)(i). As conveyed in EPA's response to ADEQ's initial notification for these events, the data ADEQ seeks to exclude (*i.e.*, 24-hour PM<sub>10</sub> concentrations measured at the West 43<sup>rd</sup> Avenue, Dysart, Zuni Hills, Glendale, and JLG Supersite monitoring stations on April 25, May 17, July 29, and September 27-28, 2016) do not currently have regulatory significance under the Exceptional Events Rule. The West 43<sup>rd</sup> Avenue, Dysart, Zuni Hills, Glendale, and JLG Supersite monitoring sites have attaining 2017 PM<sub>10</sub> design values, so it is not necessary for EPA to make a determination on ADEQ's submittal at this time.


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<sup>1</sup> ADEQ's cover letter for the demonstrations, "*Submittal and Request for Concurrence of State of Arizona Exceptional Event Documentation for high wind PM<sub>10</sub> events in the Phoenix Nonattainment Area on April 25, 2016, May 17, 2016, July 27, 2016, and September 27-28, 2016*" mistakenly identified July 27, 2016 as one of the event days. The demonstration identifies and discusses July 29, 2016.

We recognize that the development of exceptional event demonstrations requires considerable time and resources. Although EPA considers this submittal and our review on hold at this time, EPA will plan to rapidly revisit ADEQ's demonstrations for future consideration should any of the data requested for exclusion become significant for a future regulatory determination with respect to exceedances or violations of the 1987 PM<sub>10</sub> NAAQS. In such case, EPA will be pleased to reopen the demonstrations and prioritize their full review and timely action under the 2016 Exceptional Events Rule. Additionally, EPA will be pleased to discuss any other available opportunity for data exclusion afforded by the CAA or EPA regulations or guidance should one become applicable to ADEQ's specific regulatory situation.

We appreciate the open dialogue with ADEQ, and look forward to continued engagement on exceptional events. If you have any questions regarding this letter or related matters, please feel free to contact me at (415) 972-3183 or Meredith Kurpius at (415) 947-4534 at any time.

Sincerely,

  
for Elizabeth J. Adams, Acting Director  
Air Division

cc (via e-mail): Brad Busby, ADEQ